## NOTICE!

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AT THE END OF
THE DOCUMENT

#### DRAFT

## PLUTONIUM IN SOILS TREATABILITY STUDIES WORK PLANS TRUCIean PROCESS AND MAGNETIC SEPARATION

ROCKY FLATS PLANT OPERABLE UNIT 2

US DEPARTMENT OF ENERGY ROCKY FLATS PLANT GOLDEN COLORADO

**ENVIRONMENTAL RESTORATION PROGRAM** 

**NOVEMBER 14 1991** 

**VOLUME II** 

#### DRAFT

### PLUTONIUM IN SOILS TREATABILITY STUDIES WORK PLANS: TRUCIean PROCESS AND MAGNETIC SEPARATION

ROCKY FLATS PLANT OPERABLE UNIT 2

US DEPARTMENT OF ENERGY ROCKY FLATS PLANT GOLDEN, COLORADO

**ENVIRONMENTAL RESTORATION PROGRAM** 

**NOVEMBER 14, 1991** 

**VOLUME II** 

..... Secretary.

## PLUTONIUM IN SOILS TREATABILITY STUDIES WORKPLAN

#### **VOLUME II**

Section 1	Field Sampling Plan
Section 2	Health and Safety Plan
Section 3	Quality Assurance Addendum

# FIELD SAMPLING PLAN FOR THE PLUTONIUM IN SOILS TREATABILITY STUDY

(OPERABLE UNIT NO. 2)

U S. DEPARTMENT OF ENERGY
ROCKY FLATS PLANT
GOLDEN, COLORADO

**DRAFT** 

EG&G ROCKY FLATS PLANT Field Sampling Plan  Title Plutonium in Soils Treatability Studies Workplan Field Sampling Plan			Manual Section Page Effective Date Organization		21100-WP-0U02 6 FSP-2 6, Rev 0 1 of 11		
		Studies Workplan	Approved by  Manager, Remediation Programs	/_ Date	_/	-	
<del></del>		TARIF	OF CONTENTS		<del>-</del>		
TABL	E OF (	CONTENTS	OI CONTENTS			1	
LIST	OF AC	RONYMS				2	
1 0	INTE	RODUCTION				3	
20	SITE 21	BACKGROUND Operable Unit 2				3 5	
3 0	SAM	PLING PROGRAM				7	
4 0 SAMPLING PROCEDURES		PLING PROCEDURES				10	
5 0	REF	ERENCES				11	
		f	FIGURES				
Figure 1 Location Map of Rocky Flats Plant				4			
Figure	e 2	Operable Unit 2				6	
Figure	e 3	Sample Locations				8	
Figure	e 4	Surface Soils Map				9	

Ī

1

Manual Section Page Effective Date Organization 21100-WP-0U02 6 FSP-2 6, Rev 0 2 of 11

RPD

#### LIST OF ACRONYMS

cm centimeter

cpm centimeter per minute

FIDLER Field Instrument for Detection of Low Energy Radiation

GOCO government-owned, contractor-operated IHSS Individual Hazardous Substance Sites

NTS Nevado Test Site
OP Operating Procedures
OU2 Operable Unit 2
pCi/g picocuries per gram

PSCID Plutonium in Soils Cleanup Integrated Demonstration

PU plutonium

RFP Rocky Flats Plant TAL Target Analyte List

USDA US Department of Agriculture

Manual Section Page Effective Date Organization 21100-WP-0U02 6 FSP-2 6, Rev 0 3 of 11

RPD

#### 10 INTRODUCTION

This Field Sampling Plan for sampling plutonium (Pu) contaminated soils from Operable Unit 2 (OU 2) at the Rocky Flats Plant (RFP) describes the sampling objectives, the location and the number of samples to be collected, the chemical and physical parameters to be analyzed, and references the procedures for collecting the samples

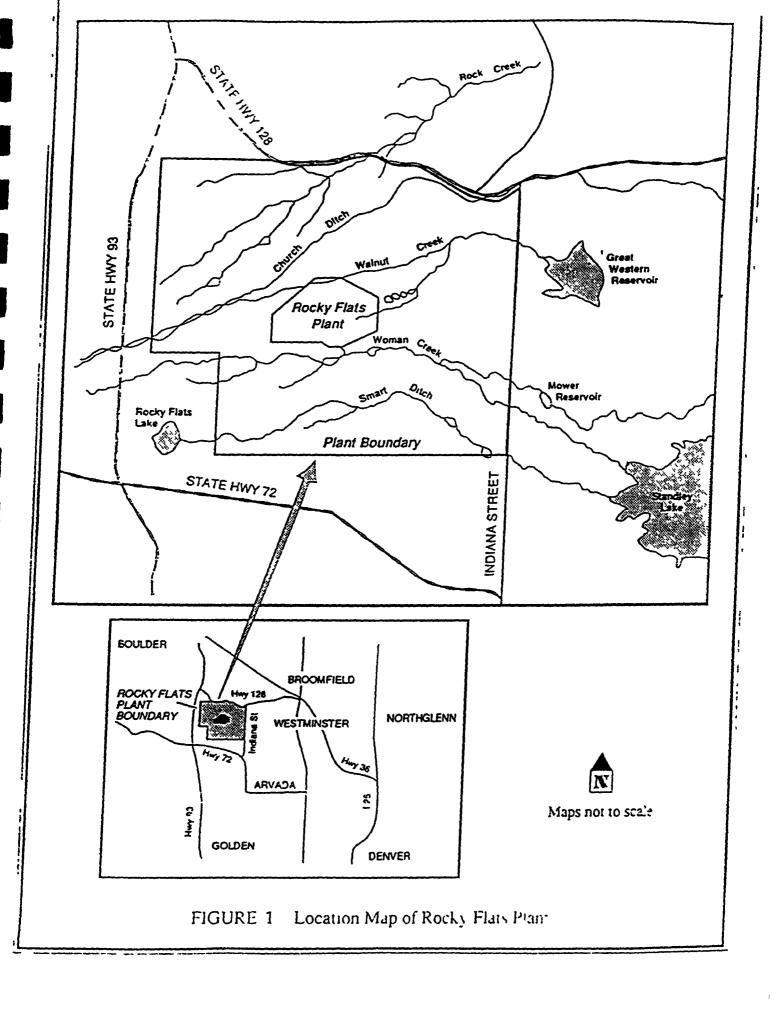
The objective of sampling Pu-contaminated soils from OU 2 is to provide data for the treatability study to be performed during the Plutonium in Soils Cleanup Integrated Demonstration (PSCID). The PSCID is being hosted by the Nevada Test Site (NTS) to evaluate gravimetric separation (physical separation/soil washing) and other potential treatments for removing plutonium/americium in soils. A bulk soil sample will be collected from each of the locations and transported to NTS for characterization and testing of the selected processes.

Four sampling locations have been selected based on soil type and expected Pu concentration. The samples will be collected from the most common types of soil present at OU 2 as described and mapped by the U.S. Department of Agriculture (USDA). Expected Pu concentrations have been estimated based on analytical results obtained during past soil sampling east of the 903 Pad area. A bulk composite sample will be collected from each of the sample locations. A subsample of the bulk sample will be analyzed for various physical and chemical parameters.

#### 2 0 SITE BACKGROUND

RFP is located in northern Jefferson County, Colorado, approximately 16 miles northwest of downtown Denver (Figure 1). The plant site consists of approximately 6,550 acres of federally-owned land in Sections 1 through 4, and 9 through 15, of T2S, R70W, 6th principal meridian. Plant buildings are located within a 400-acre area known as the RFP security area. The security area is surrounded by a buffer zone of approximately 6,150 acres.

RFP is a government-owned, contractor-operated (GOCO) facility. It is part of a nationwide nuclear weapons research, development, and production complex administered by the Department of Energy -- Rocky Flats Office. The operating contractor for RFP is EG&G Rocky Flats, Inc. The facility manufactures



Manual Section Page Effective Date Organization

21100-WP-0U02 6 FSP-2 6, Rev 0 5 of 11

**RPD** 

components for nuclear weapons and has been in operation since 1951. Historically, production activities have included metal fabrication, machining, and assembly. Both radioactive and nonradioactive wastes are generated in the process. Current waste handling practices involve onsite and offsite recycling of hazardous materials and onsite storage of solid radioactive materials.

RFP is currently an interim status RCRA hazardous waste treatment/storage facility. In the past, both storage and disposal of hazardous and radioactive wastes occurred onsite. Preliminary assessments conducted under Phase 1 of the Environmental Restoration Program identified some of the past onsite storage and disposal locations as potential sources of environmental contamination (EG&G, 1989)

#### 2 1 Operable Unit 2

There are 20 sites designated as Individual Hazardous Substance Sites (IHSSs) that comprise the 903 Pad, Mound, and East Trenches Area These sites are known collectively as OU 2 and are located east-southeast of RFP security area (Figure 2)

The 903 Drum Storage Site (903 Pad) (IHSS No. 112) was used from 1958 to 1967 to store drums containing mixed waste. The drums, some of which corroded and leaked, contained oils and solvents contaminated with Pu or uranium.

During drum removal and cleanup activities associated with the 903 Pad, winds transported Pu to the south and east into the area currently defined as OU 2. The most contaminated area was located south and southeast of the pad. This area has been designated as the 903 Lip Site (IHSS No. 155). Surveys at the time of the drum removal project and subsequent annual soil sampling from 1969 to 1972 showed a maximum Pu concentration of 2,258 picocuries per gram (pCi/g) in the top 5 centimeters (cm) of soil at the 903 Lip Site (EG&G, 1989).

Soil cleanup efforts were undertaken in 1976, 1978, and 1984 to remove Pu-contaminated soils from the 903 Lip Site. The 1976 soil removal consisted of hand-excavating contaminated soils until the contamination levels were below the lower detection limit of the Field Instrument for Detection of Low-Energy Radiation (FIDLER). The lower detection limit of FIDLER is 250 counts per minute (cpm). The excavated area was covered with clean topsoil and reseeded with native grasses.

EG&G ROCKY	FLATS	PLANT
Field Sampling	Plan	

Manual Section Page Effective Date Organization

21100-WP-0U02 6 FSP-2 6, Rev 0 7 of 11

During the 1978 soil removal project, all soil that exceeded 2,000 cpm, as determined with FIDLER, was removed. The excavated areas were resurveyed with FIDLER, and soil removal continued until background readings (approximately 250 cpm) were obtained. Topsoil was added to the excavated areas, and the site was reseeded with native grasses.

A third soil removal effort was performed during 1984 An area along the eastern edge of the 903 Lip Site was excavated and backfilled with clean topsoil

#### 3 0 SAMPLING PROGRAM

Four soil sampling locations have been selected in OU 2 east of the 903 Pad (Figure 3). The locations were selected based on soil type and expected Pu concentrations. The two soil types to be sampled have been classified as soil type 31-Denver-Kutch-Midway clay loams, and soil type 45-Flatirons very cobbly sandy loam (USDA, 1980) (Figure 4). Expected concentrations of Pu range from approximately less than 10 pCi/g at the extreme eastern locations, to approximately 500 pCi/g in the soils at the location southeast of the 903 Pad.

At each location, a bulk composite sample will be collected using a stainless-steel shove! The sampling procedures will follow procedures specified in a procedure change notice to EG&G Environmental Restoration Standard Operating Procedure GT 08. The procedure change notice addresses specific sampling procedures to be used to support treatability studies at Nevada Tests Site and the Los Alamos National Laboratory. The sampling procedure will result in a bulk sample of approximately 1660 kilograms (3660 lbs.) that will be divided between Nevada Test Site (87.5%), Los Alamos National Laboratory (6.25%), and Rocky Flats Plant (6.25%). A subsample of the RFP sample will be obtained for analyses of physical parameters. EG&G will perform an onsite radiological activity screening of the samples before the samples are shipped offsite.

The RFP subsample collected for analysis of chemical parameters will be split and transferred to appropriate containers. A portion of the composite sample will be analyzed for Target Analyte List (TAL) metals using EPA Method 6010, volatile organic compounds using EPA Method 8240, and semi-volatile

Manual Section Page Effective Date Organization

21100-WP-0U02 6 FSP-2 6, Rev 0 10 of 11

RPD

organic compounds using EPA Method 8250 A portion of the composite sample will be containerized and analyzed for Total Radionuclides, including <sup>239</sup>Pu, <sup>240</sup>Pu, <sup>238</sup>Pu, <sup>241</sup>Am, <sup>233</sup>U, <sup>234</sup>U, <sup>235</sup>U, <sup>238</sup>U, gross alpha, and gross beta

#### 4 0 SAMPLING PROCEDURES

Sampling procedures will follow those specified in the procedure change notice to ER OP GT 08. The specifics of the sampling procedures are detailed in Volume I of the Plutonium in Soils Treatability Studies Workplan. All field work will be performed in accordance with the health and safety plan developed for this task. The health and safety plan is included in Section 2.0 of Volume II.

Samples will be collected using stainless-steel shovels and will be limited to A-horizon material. The sampling will be conducted in a manner that minimizes impact to the surrounding vegetation. Sampling will continue until the neccessary volume of soil has been obtained. Sampling and decontamination procedures will follow guidelines presented in RFP EG&G Operating Procedures (OPs) FO 3-- General Equipment Decontamination, FO 13-- Containerization, Preserving, Handling, and Shipping of Soil and Water Samples, FO 16-- Field Radiological Measurements, and GT 08-- Surface Soil Sampling (EG&G, 1990). Any substantial excavation will be backfilled with pea gravel. The sample location will be marked with a metal stake in the event that additional sampling is required for the treatability study. The project, time, and date will be recorded on a metal tag which will be attached to the stake.

Chain-of-custody procedures outlined in EG&G OP FO 13 will be strictly followed. Samples will be shipped to NTS in accordance with U.S. Department of Transportation regulations.

Manual Section Page Effective Date Organization

21100-WP-0U02 6 FSP-2 6, Rev 0 11 of 11

**RPD** 

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## HEALTH AND SAFETY PLAN FOR THE PLUTONIUM IN SOILS TREATABILITY STUDY

(OPERABLE UNIT NO. 2)

U.S DEPARTMENT OF ENERGY
ROCKY FLATS PLANT
GOLDEN, COLORADO

**DRAFT** 

		Y FLATS PLANT afety Plan	Manual Section Page Effective Date Organization	21100-WP-0U02 6 HSP-2 6, Rev 0 1 of 17
Treat	onium in tability Si th & Safe		Approved by  Manager, Remediation Programs	// Date
		TAB	LE OF CONTENTS	
TABL	E OF CC	ONTENTS		1
LIST	OF ACR	ONYMS		2
Α	GENE	RAL SITE INFORMATION		3
В	HAZAI	RDOUS MATERIALS		6
С	HAZAI	RD EVALUATION		6
D	SITE	OPERATIONS		8
E	E SITE PERSONNEL			11
F	F EMERGENCY INFORMATION			12
G	PLAN	APPROVAL		14
Н	EMPL	OYEE CERTIFICATION		14
			FIGURES	
Figur	re 1	Location Map of Rocky Flats	s Plant	15
Figur	e 2	Building 122 Medical Facility	•	16
Figur	re 3	Sample Locations		17

**EG&G ROCKY FLATS PLANT** Health and Safety Plan

Manuai Section Page **Effective Date** Organization

21100-WP-0U02 6 HSP-2 6, Rev 0 2 of 17

RPD

#### LIST OF ACRONYMS

CDH Colorado Department of Health

CERCLA Comprehensive Environmental Response Compensation and Recovery Act

centimeter cm

counts per minute cpm Department of Energy DOE

**EMAD** Environmental Monitoring and Assessment Division

**Environmental Protection Agency EPA Environmental Restoration** ER

FID Flame Ionization Detector

FIDLER Field Instrument for Detection of Low Energy Radiation

FO Field Operations H&S Health and Safety

**HAZMAT** Hazardous Materials Agency **HEPA** High Efficiency Particulate Air Health and Safety Program Plan **HSPP** IHSS Individual Hazardous Substance Site

mph miles per hour NPL National Priority List OP Operating Procedure

OTJ On the Job

pCi/g picocuries per gram ppm parts per million

PU Plutonium

RCRA Resource Conservation and Recovery Act

RFP **Rocky Flats Plant** 

Radiological Operating Instructions ROI **RPTs** Radiation Monitor Technician **SCBA** Self Contained Breathing Apparatus

**VOCs** Volatile Organic Compounds EG&G ROCKY FLATS PLANT Health and Safety Plan

Manual Section Page Effective Date Organization 21100-WP-0U02 6 HSP-2 6, Rev 0 3 of 17

RPD

#### A GENERAL SITE INFORMATION

SITE NAME Rocky Flats Plant (RFP)

PROJECT NO 5761 20

PROJECT NAME SOIL SAMPLING AT ROCKY FLATS PLANT FOR THE PLUTONIUM-CONTAMINATED SOILS CLEANUP - INTEGRATED DEMONSTRATION PROGRAM

SITE LOCATION Golden, CO

DATES OF VISIT To be determined

#### **OBJECTIVE**

This plan outlines the health and safety protocol to be followed during SOIL SAMPLING AT ROCKY FLATS PLANT FOR THE PLUTONIUM- CONTAMINATED SOILS CLEANUP - INTEGRATED DEMONSTRATION PROGRAM The program consists of the collection of four bulk sample of plutonium (Pu) contaminated surface soils. The expected Pu concentration in the soils range from 10 pCi/g to 500 pCi/g. The samples will be obtained from four areas located east of the 903 Pad (IHSS 155). The sample locations are plotted on Figure 3. This health and safety plan is a revision of a health and safety plan that was approved by EG&G for a similar sampling task that occurred on October 19, 1990. The task is expected to take up to two week to complete and is scheduled to be performed sometime during 1991. The comments received from the EG&G Health and Safety (H&S) review have been incorporated.

ORIGINAL SAFETY PLAN? yes/no REVISION NO 2

#### SITE CONTACT & PHONE NO

R Lindberg 966-5963 - Interim Manager of Soils, Sediments, and Surface Water

1 Litaor 966-5970 - Principal Senior Soil Geochemist

O Erlich 273-6110 - Environmental Engineer
D Smith 966-5958 - ER Health and Safety Officer

#### SITE TYPE

Active Department of Energy (DOE) facility involved in the production of metal components for nuclear weapons

MAP ATTACHED? yes

#### SITE HISTORY

RFP is a government-owned contractor-operated facility EG&G is the present primary operating contractor. The plant has been in operation since 1952. It is involved in manufacture of the "pit assembly" plutonium component of nuclear weapons, reprocessing scrap and plutonium from dismantled weapons, laboratory research on properties of nuclear materials, and fabrication of other metals such as steel and beryllium.

EG&G	ROCKY	' FLATS	PLANT
Health	and Sa	fety Pla	n

Manual Section Page Effective Date Organization

21100-WP-0U02 6 HSP-2 6, Rev 0 4 of 17

RPD

Wastes produced include hazardous wastes, low-level and transuranic radioactive wastes, and mixed wastes. Historically, these wastes have been either disposed onsite, stored in containers onsite, or disposed offsite. RFP was proposed for inclusion on the Superfund National Priority List (NPL) in 1984 and included on the NPL in the October 4, 1989, Federal Register. Cleanup is being conducted under the Response. Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response. Compensation and Recovery Act (CERCLA). Environmental Protection Agency (EPA), DOE, and Colorado Department of Health (CDH) are involved in assessment and cleanup roles at the plant. A draft Interagency Agreement between the three was released for public comment in December 1989 and was produced to clarify the roles and responsibilities of each agency.

#### SITE DESCRIPTION & FEATURES

The plant site covers approximately 6,550 acres in Jefferson County, Colorado, Sections 1 through 4 and 9 through 15 of R70W, T2S. The facility is centered at 105 degrees 11.30" west longitude, 39 degrees 53.30" north latitude. This location is 16 miles northwest of Denver and 9 to 12 miles from the communities of Boulder, Broomfield, Golden, and Arvada. It is approximately bounded on the north by State Highway 128, on the west by State Highway 93, on the south by State Highway 72, and on the east by Jefferson County Highway 17 (Indiana Street). Major plant structures, including all production buildings, are located within a 384-acre security fenced area. The plant is divided into several areas constituting separate operational complexes. The major production facilities and associated complexes are in the 300, 400, 600, 700, 800, and 900 areas (refer to Figure 1).

The Environmental Monitoring and Assessment Division (EMAD) has requested soil sampling be performed to provide a bulk sample required for the plutonium-contaminated soils cleanup treatability study to be performed under the Integrated Demonstration Program

#### DESCRIPTION OF SPECIFIC SITE AREA(S) OF CONCERN

The areas to be sampled are plotted on Figure 3. The areas were impacted by wind-born contamination emanating from the 903 Pad drum removal activities. The site to be sampled is located east of the 903 Pad (IHSS 155). No ongoing plant activities will impact the sample area. The following is a brief discussion of the history of IHSS 155 obtained from the PHASE II RI/FS WORK PLAN ROCKY FLATS PLANT 903 PAD, MOUND, AND EAST TRENCHES AREAS OPERABLE UNIT NO 2, DECEMBER 1989.

#### IHSS 155 903 Lip Site

During drum removal and cleanup activities associated with the 903 Drum Storage Site (903 Pad), winds redistributed plutonium to the south and east. The most contaminated area was immediately adjacent to the pad to the south and southeast. Surveys at the time of the drum removal project and subsequent annual soil sampling from 1969 to 1972 showed a maximum plutonium concentration of 2,258 pCi/g in the top five centimeters (cm) of soil at the 903 Lip Site.

Soil cleanup efforts were undertaken in 1976, 1978, and 1984 to remove plutonium-contaminated soils from the 903 Lip Site. The 1976 soil removal consisted of hand-excavating contaminated soils until the

EG&G ROCKY FLATS PLANT Health and Safety Plan

Manual Section Page Effective Date Organization 21100-WP-0U02 6 HSP-2 6, Rev 0 5 of 17

**RPD** 

contamination levels were below the lower detection limit of the Field Instrument for Detection of Low-Energy Radiation (FIDLER) The lower detection limit of FIDLER is 250 counts per minute (cpm) The excavated area was covered with clean topsoil and reseeded with native grasses

During the 1978 soil removal project, all soil that exceeded 2000 cpm, as determined with FIDLER, was removed. The excavated areas were resurveyed with FIDLER, and soil removal continued until background readings (approximately 250 cpm) were obtained. Topsoil was added to the excavated areas, and the site was reseeded with native grasses.

A third soil removal effort was performed during 1984. An area along the eastern edge of the 903 Lip Site was excavated and backfilled with clean topsoil

SURROUNDING POPULATION rural / residential / commercial / industrial / other

The Plant is located adjacent to foothills west of Denver Rural areas are located to west, populated areas are located to the east

21100-WP-0U02 6 Manual **EG&G ROCKY FLATS PLANT** Section HSP-2 6, Rev 0 Health and Safety Plan Page 6 of 17 **Effective Date RPD** Organization B HAZARDOUS MATERIALS/WASTE CHARACTERISTICS MATERIAL TYPE(S) Liquid Solid Sludge Gas Other **CHARACTERISTICS** Corrosive Ignitable Radioactive x Volatile Toxic Reactive Unknown Other HAZARDOUS MATERIAL SUMMARY Source/Quanity/Characteristics Hazardous Material/Waste 903 Pad/Obtain 4 / 10 - 500 pCi/g bulk samples Plutonium-contaminated soil C HAZARD EVALUATION HAZARDS OF CONCERN Organic Chemicals Inorganic Chemicals Pesticides/PCBs LLW TRU X Biologic Slip, trip, fall Weather

Describe ongoing facility operations of concern & any other potential hazards

x - radiological

Ongoing facility operations in area\_\_

Power lines Other

The sites to be sampled are located in the RFP east buffer zone, no ongoing plant operations will impact

EG&G ROCKY FLATS PLANT	Manual	21100-WP-0U02 6
Health and Safety Plan	Section	HSP-2 6, Rev 0
•	Page	7 of 17
	Effective Date	
	Organization	RPD

the area

CHEMICAL EXPOSURE HAZARD SUMMARY

TASK HAZARD ASSESSMENT

OVERALL HAZARD High Moderate X Low Provide rational

The overall exposure hazard is considered to be moderate, as Pull concentrations detected during 1989 sampling in this area ranged from 7.7 to 283 pCi/g. The primary hazard associated with this sampling task is the threat of ingestion or inhalation of plutonium-contaminated material. This threat will be minimized by utilizing the procedures listed in Section D of this plan.

#### CHEMICAL EXPOSURE HAZARD SUMMARY

Hazardous Material/Waste	Exposure Limit	Potential Pathways of Exposure	Signs or Symptoms of Acute Exposure
Plutonium 239	5 rem/yr ALARA	Inh, Ing, Con	(Personnel continuously monitored with RFP dosimeters)
Plutonium 240	5 rem/yr ALARA	inh, ing, Con	(Personnel continuously monitored with RFP dosimeters)
Americium 241	5 rem/yr ALARA	inh, ing, Con	(Personnel continously monitored with RFP dosimeters)

EG&G ROCKY FLATS PLANT Manual 21100-WP-0U02 6
Health and Safety Plan Section HSP-2 6, Rev 0
Page 8 of 17
Effective Date

Organization

RPD

#### D SITE OPERATIONS

#### TASK 1

Obtain a bulk surface soil sample (0 to 20 cm) from four locations using a shovel or a stainless-steel scoop. The site will be monitored with an Foxboro OVA128 by the contractor's field crew prior to and during sampling. The Foxboro will be calibrated with methane at 100 ppm in air. Volatile organic compounds (VOCs) are not anticipated to be present. The use of a Flame Ionization Detector (FID)-type monitor will confirm that VOCs are not present at the sample location. The site will be monitored by EG&G or contractor's Radiation Monitor Technicians (RPTs) during sampling. Copies of H&S equipment calibration and data obtained during the sampling task will be made available to EG&G H&S personnel.

Level of protection A\_B\_CXD\_

Schedule To be determined

PROTECTIVE EQUIPMENT (specify probable quantity required, N/A = not applicable)

Respiratory	N/A
SCBA, Airl x Full Face F HEPA/ACT Escape Ma None Other	Respirator IVATED CARBON cartridge
Clothing	N/A
Chemically Apron, Spe x Tyvek Cov Saranex C	verall
Head and Eye	N/A
_x_Hard Hat a Goggles Face Shield Chemical E	

EG&G ROCKY FLATS PLANT Health and Safety Plan

TASK 1

Manual Section Page Effective Date Organization 21100-WP-0U02 6 HSP-2 6, Rev 0 9 of 17

RPD

Nonex_Other_Safety Glasses with side shields
Hand Protection N/A
x_Gloves (Type)see below _x_Undergloves (Type)_Latex _x_Overgloves (Type)_nitrile Other
Foot Protection N/A
x Safety Boots x Latex Disposable Overboots Other
MONITORING EQUIPMENT
CGI PID  x FID - action level is 2.5 ppm sustained above background for volatile compounds - If a sustained reading of 2.5 ppm is measured in the breathing zone of the worker, full-face respirators with appropriate cartridges will be donned O <sub>2</sub> Meter  x Rad Survey provided by RFP or Contractor RPTs following ROI 2.1, 2.3, 3.1, 3.2 procedures RPTs will monitor the site prior to sampling activities and when the workers are
leaving the sample location <u>x</u> Other External Dosimetry, Fecal and urine bioassays Detector TubesTypex Other RPTs will utilize EBERLINE SAC-4, LUDLUM -12-1A, LUDLUM-31 monitors
SITE ACCESS/CONTROL
R Lindberg 966-5963 - Interim Manager of Soils, Sediments, and Surface Water I Litaor 966-5970 - Principal Senior Soil Geochemist O Erlich 273-6110 - Environmental Engineer D Smith 966-5958 - Environmental Restoration (ER) Health and Safety Officer
DECONTAMINATION PROCEDURES

EG&G ROCKY FLATS PLANT	Manual	21100-WP-0U02 6
Health and Safety Plan	Section	HSP-2 6, Rev 0
·	Page	10 of 17
	Effective Date	
	Organization	RPD

An exclusion zone for decontamination activities will be delineated by four traffic cones adjacent to the sample location The decontamination area within the exclusion zone will consist of plastic set on the ground with two tubs, two scrub brushes, and two sprayers set on the plastic. One sprayer will be filled with a non-phosphate detergent and distilled water, the other sprayer will contain distilled water. Prior to leaving the sampling area, all personnel will be required to decontaminate themselves by the following process. All personal equipment contacting soil will be scrubbed with a non-phosphate detergent wash followed by a thorough distilled water rinse. Personnel will perform a field hand wash with distilled water at the work area Personnel will be monitored by a RPT following procedures ROI 2 1, 3 1, and 3 2, prior to leaving the work area. Personnel determined to be contaminated by the RPT will be handled following procedure ROI 2 3, to be followed by a bioassey Personnel determined not to be contaminated will take a total body shower at Building T764A

#### **WORK LIMITATIONS**

- 1 Heat stress limitations per the RFP HSPP will be imposed. If the ambient temerature is greater than 70° F, work will be performed in 30-minute intervals with 15-minute rest periods between work intervals
- 2 Work will be stopped if winds exceed 15 mph for two consecutive 15-minute intervals. Radio communication will be maintained between site workers and the EG&G construction manager, who will inform the workers of wind speeds
- 3 The soil will be wetted with distilled water to minimize the potential for resuspension prior to sampling
- 4 The full-face respirators will be donned when intrusive activities (actual sampling) occur

#### INVESTIGATION DERIVED MATERIAL DISPOSAL

All solids collected will be kept as samples Decon water will be containerized and transported to the decon pad located at the EG&G 800 Area Contractor's Lot per ER OP FO 6 Protective clothing and disposables will be bagged and transported to the contractor trailer area for proper RFP onsite disposal per ER OP FO 7 The samples will be radiologically screened by RPTs prior to offsite transport

#### ADDITIONAL NOTATIONS None

#### E SITE PERSONNEL

		Medical	40 hr	24 hr O I J	Fit Test	CPR/	Cert *	Supervisor
	Name	Current	Training	Training	Current	First Aid	Level	Training
Project Manager	Craig C Allen	Y	Υ	Ý	Υ	Y	В	Y
Field Team Leader	Craig C Allen	Υ	Υ	Y	Y	Y	В	Υ
H&S Officer	Steve Brown	Y	Υ	Υ	Y	Ÿ	8	Υ
Field Staff	Steve Brown	Υ	Υ	Υ	Y	Y	В	Y
	John Boylan	Υ	Y	Υ	Y	Y	Ċ	N
	Dan Reeder	Ý	Υ	Υ	Υ	Y	С	N

<sup>\*</sup>Note Certification level refers to the maximum level of protection as described by OSHA 1910 120 that personnel are qualified by training and experience to wear

EG&G ROCKY FLATS PLANT Health and Safety Plan

Manual Section Page Effective Date Organization 21100-WP-0U02 6 HSP-2 6, Rev 0 11 of 17

RPD

SITE-SPECIFIC TRAINING AND MEDICAL MONITORING REQUIREMENTS RFP courses Rad Safety (476) Industrial Safety (429), RCRA (435), Respirator Indoctrination (284), Respirator Fit Test All training records and medical fitness records are on file at the Stoller office and the RFP Stoller Field Trailer located at the EG&G 800 Area Construction Lot Fecal and urine bioassays are required for this sampling effort

EG&G ROCKY FLATS PLANT Health and Safety Plan

Manual Section Page Effective Date Organization 21100-WP-0U02.6 HSP-2 6, Rev 0 12 of 17

RPD

#### **F EMERGENCY INFORMATION**

Emergency Phone Numbers (If onsite emergency assistance available, please list site numbers)

The nearest phone is located at the Stoller field trailer. The field crew will be in radio communication with the Stoller site supervisor at the Stoller trailer.

Ambulance	<u> 2911</u>
Medical	2911
Fire	2911
Police	2911
Poison Control Center	2911 (Onsite contact)
Other	
Project Manager	449-7220

 Project Manager
 449-7220

 Site Contact
 273-6110

 H & S Coordinator
 447-5940

 Ambulance
 2911

 Medical
 2911

 Fire
 2911

 Police
 2911

 Poison Control Center
 2911

 Other

 Project Manager
 449-7220

 Site Contact
 966-5958

 H & S Coordinator
 449-7220

EG&G ROCKY FLATS PLANT Health and Safety Plan Manual Section Page Effective Date Organization 21100-WP-0U02 6 HSP-2 6, Rev 0 13 of 17

RPD

#### **CONTINGENCY PLANS**

Spill, Accidental Release Call 2911

Fire, Explosion Call 2911 or use fire alarm or fire phone

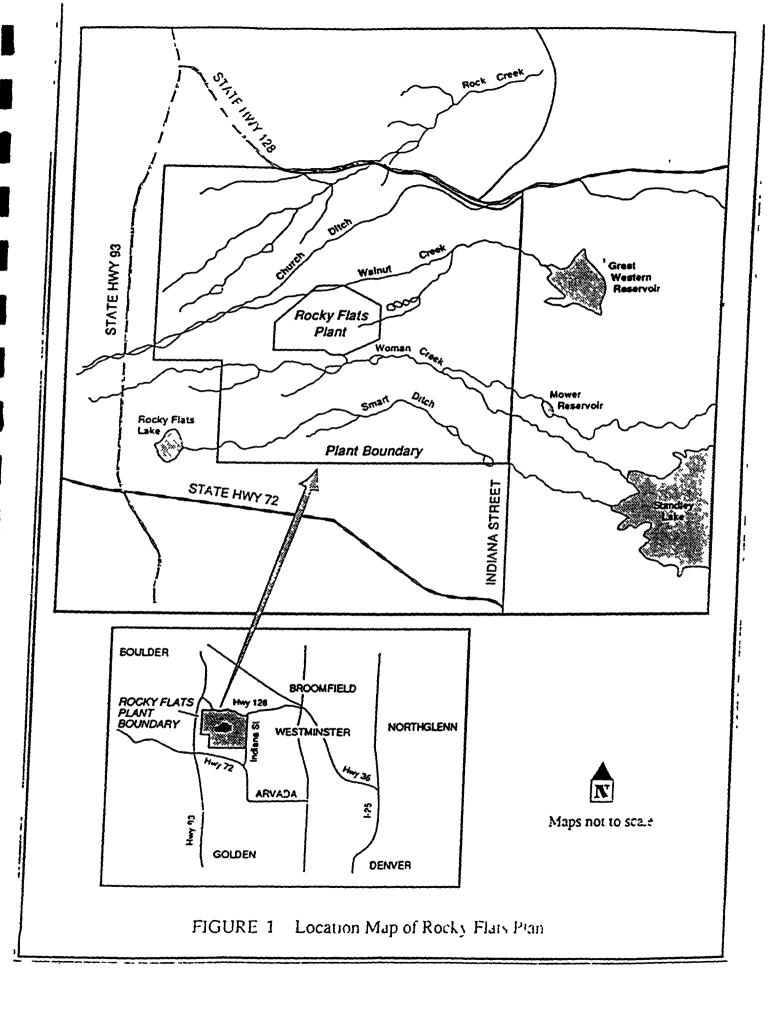
Other Evacuate area if in immediate danger

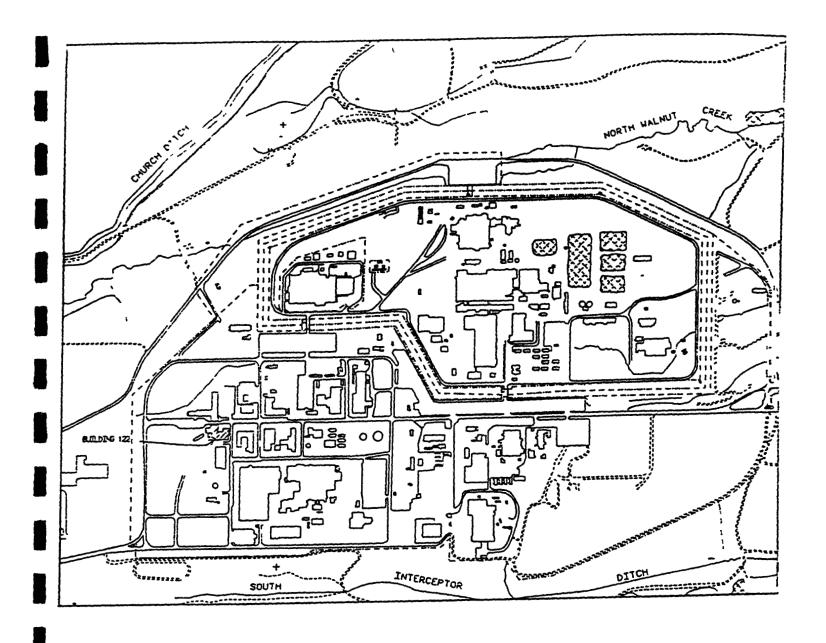
EMERGENCY ROUTE TO NEAREST HOSPITAL (attach map) Onsite medical facility - Bldg 122 (See Fig 2)

#### **EVACUATION PROCEDURES**

Follow instructions given over public address system, otherwise upwind

EG&G ROCKY FLATS PLANT Health and Safety Plan	Manual Section Page Effective Date Organization	21100-WP-0U02 6 HSP-2 6, Rev 0 14 of 17			
G PLAN APPROVAL					
Plan Prepared By Craig C Allen					
Health & Safety Coordinator E Stephen	Brown				
Project Manager Craig C Allen					
PROJECT NO 5761 20					
H EMPLOYEE CERTIFICATION					
I certify that have read, understand and ag	gree with the contents of this H	ealth and Safety Plan			
Name					
Date					
Name					
Date					
Name					
Date					
Name					
Date					
Name					
Date					







STREAMS DITCHES DRAINAGE FEATURES

PAVED ROADS

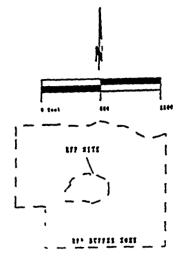
== DIRT ROADS

- SECURITY FENCE

SURFACE WATER INPOUNDMENTS

BUILDING 122

BLILDING 122 MEDICAL FACILIT



#### **QUALITY ASSURANCE ADDENDUM**

to the

#### **ROCKY FLATS SITE-WIDE QA PROJECT PLAN**

## FOR CERCLA RI/FS AND RCRA RFI/CMS ACTIVITIES

for the

#### PLUTONIUM IN SOILS TREATABILITY STUDY

(OPERABLE UNIT NO. 2)

U.S. DEPARTMENT OF ENERGY Rocky Flats Plant Golden, Colorado

DRAFT

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ed By·		
Manager, Remediation Programs Date		
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Qual	G Rocky Flats ity Assurance Addendum to the Rocky Flats Wide Quality Assurance Project Plan	Manual. Section Page Effective Date	21100-WP-OU02 6 QAA-2.6, Rev 0 2 of 19
8 0	Identification and Control of Items, Samples, and	i Data	13
	8 1 Sample Containers		13
	8 2 Sample Identification		14
	8 3 Chain-of-Custody		15
90	Control of Processes		15
100	Inspections		15
110	Test Controls		15
120	Control of Measuring and Test Equipment		15
13 0	Handling, Storage, and Shipping		15
140	Status of Inspection, Test, and Operations		15
15 0	Control of Nonconformances		16
160	Corrective Action		16
17 0	Quality Assurance Records		16
18 0	Quality Verification		17
19 0	Software Venfication		17
	List of Ta	ables	
Tabl	e 1 EG&G Operating Procedures That are App	licable to Collecting	
	Plutonium-Contaminated Soils at OU-2		10
	List of Fi	gures	
Figu	re 1 Project Management for Sampling Plutoniu	m in Soils Treatability Study	5
	List of Attac	chments	
Atta	chment A Analytical Methods, Detection Limits, a	and Data Quality Objectives	18

**EG&G Rocky Flats** 

Quality Assurance Addendum to the Rocky Flats Site-Wide Quality Assurance Project Plan

Manual Section

Page.

21100-WP-OU02 6 QAA-2 6, Rev 0

3 of 19

Effective Date.

#### LIST OF ACRONYMS

CERCLA Comprehensive Environmental Response Compensation and Liability Act

DOE US Department of Energy

DOT US Department of Transportation

DQO **Data Quality Objective** 

EM **Environmental Management** 

IAG Interagency Agreement

LANL Los Alamos National Laboratories

Nevada Test Site NTS

0P **Operating Procedure** 

OU Operable Unit

**PARCC** Precision, Accuracy, Representativeness, Completeness, and Comparability

Plutonium in Soil Treatability Studies Work Plan

pC<sub>I</sub>/g Picocuries per gram QA Quality Assurance

QAA Quality Assurance Addendum

**QAPIP** Quality Assurance Project Plan

QC Quality Control

**RCRA** Resource Conservation and Recovery Act

**RFP** Rocky Flats Plant

RPD Remediation Programs Division SOP

Standard Operating Procedure

TAL Target Analyte List

STS Work Plan

VOA Volatile Organic Analysis

VOC Volatile Organic Compounds EG&G Rocky Flats
Quality Assurance Addendum to the Rocky Flats
Site-Wide Quality Assurance Project Plan

Manual<sup>\*</sup>
Section
Page.
Effective Date.

21100-WP-OU02 6 QAA-2.6, Rev 0 4 of 19

#### INTRODUCTION AND SCOPE

This Quality Assurance Addendum (QAA) supplements the "Rocky Flats Plant Site-Wide Quality Assurance Project Plan for CERCLA Remedial Investigation/Feasibility Studies and RCRA Facility Investigations/Corrective Measures Studies Activities" (QAPJP) The QAA establishes the specific Quality Assurance (QA) controls applicable to the field investigation activities described in the Plutonium in Soils Treatability Studies Work Plan (STS Work Plan)

The objective of the plutonium in soils treatability study is to evaluate the abilities of the TRUclean process and magnetic separation to reduce the concentration of plutonium and the levels of gross alpha/beta in Department of Energy (DOE) Rocky Flats Plant (RFP) soils to acceptable levels. The treatability study, as described in the STS Work Plan, consists of collecting a bulk sample of plutonium-contaminated soils from the Operable Unit No. 2 (OU-2) area, splitting this bulk sample into subsamples, and shipping the split samples offsite to conduct the TRUclean and magnetic separation studies. The TRUclean process study will be conducted at the Nevada Test Site (NTS) by AWC-Lockheed. The magnetic separation study will be conducted at Los Alamos National Laboratories (LANL).

In order to evaluate the effectiveness of the TRUclean process and magnetic separation, pre-treatment and post-treatment soil samples will be characterized as described in the STS Work Plan. This QAA addresses the quality assurance/quality control (QA/QC) requirements applicable to the collection of the bulk soil sample and analysis of the pre- and post-treatment samples.

#### 1.0 ORGANIZATION AND RESPONSIBILITIES

The overall organization of EG&G Rocky Flats and the Environmental Management (EM) divisions involved in environmental restoration activities is shown in Figures 1-1, 1-2, and 1-3 of Section 1 0 of the QAPJP Individual responsibilities are also described in Section 1 0 of the QAPJP

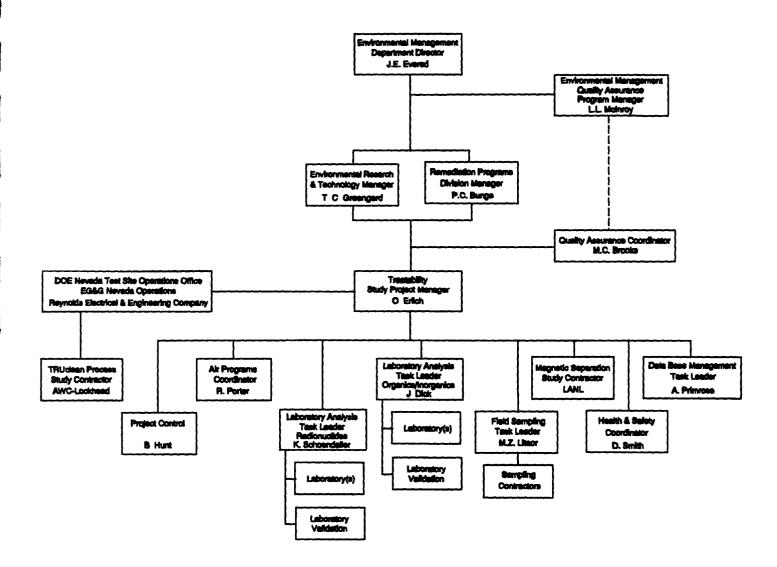
Contractors will be tasked by EG&G Rocky Flats to implement the field activities outlined in the STS Work Plan. The specific EM Department personnel who will interface with the treatability study contractors and who will provide technical direction are shown here in Figure 1.

EG&G Rocky Flats
Quality Assurance Addendum to the Rocky Flats
Site-Wide Quality Assurance Project Plan

Manual Section
Page
Effective Date.

21100-WP-OU02 6 QAA-2 6, Rev 0 5 of 19

Figure 1 Project Management for Sampling Plutonium in Soils Treatability Study



EG&G Rocky Flats	Manual	21100-WP-OU02 6
Quality Assurance Addendum to the Rocky Flats	Section	QAA-2 6, Rev 0
Site-Wide Quality Assurance Project Plan	Page Effective Date	6 of 19

### 2.0 QUALITY ASSURANCE PROGRAM

The QAP<sub>j</sub>P was written to address QA controls and requirements for implementing Interagency
Agreement (IAG) related activities. As such, the controls and requirements addressed in the QAP<sub>j</sub>P are
applicable to OU-2 plutonium in soils treatability study activities, unless specified otherwise in this QAA
As a supplement to the QAP<sub>j</sub>P, this QAA addresses additional and site-specific QA controls and
requirements that are applicable to the treatability study activities

## 2 1 Training

All EG&G Rocky Flats and contractor personnel involved in performing field activities at RFP shall complete the minimum training requirements specified in Section 2 0 of the QAPjP In addition, all personnel performing activities in accordance with the EM Department Operating Procedures (OPs), which are also referred to as Standard Operating Procedures (SOPs), specified in this QAA shall receive documented training on the QAPjP, this QAA, the applicable OPs, and any training specified in the OPs prior to performing the work

## 3.0 DESIGN CONTROL AND CONTROL OF SCIENTIFIC INVESTIGATIONS

The plutonium in soils treatability study shall be controlled by conducting the study in accordance with a documented work plan that is prepared, reviewed, and approved according to the requirements of Section 5 0 of the QAPjP. The treatability study, including field sampling, sample preparation, treatment, and analysis of samples, shall be implemented according to documented, reviewed, and approved procedures.

### 3 1 Design Control

The STS Work Plan is the design control plan for soil sampling and characterization activities. The STS Work Plan specifies the objectives of the treatability tests, describes the TRUclean and magnetic separation processes, and discusses and/or references the proposed sampling procedures, treatability procedures, and analytical methodologies. The STS Work Plan will be reviewed and approved by the Remedial Programs Division (RPD) Manager, or designee, prior to implementing the work described in the Work Plan. Once the Work Plan has been reviewed and approved, any changes or revisions will also be reviewed and approved by the RPD Manager or designee.

### 3 2 Data Quality Objectives

Manual Section Page Effective Date

21100-WP-OU02 6 QAA-2 6, Rev 0 7 of 19

Data quality objectives (DQOs) quantitatively and qualitatively describe the uncertainty that decision makers are willing to accept in results derived from environmental data. This uncertainty is used to specify the quality of the data required to meet the objectives of the investigations. The process for developing DQOs for remedial investigations is summarized in Appendix A of the QAPJP. An integral part of the DQO development process is defining the intended use(s) (or objectives) of the data, which in turn assists in determining the analytical level that is appropriate for the intended use. Five analytical levels have been established for determining DQOs. The analytical level determines the type of analysis or measurement needed to produce the data and the data quality controls and objectives for the data to satisfy the intended use(s). These levels (analytical levels I - V) are discussed in Appendix A of the QAPJP.

### 3 2 1 Objectives

The objective of the treatability study is to evaluate the ability of the treatment process to reduce the level of radionuclide contamination, specifically gross alpha, gross beta, and plutonium 239 plus 240, in RFP soils to acceptable levels. Soil cleanup goals for RFP have been established for these radionuclides based on human health and environmental risk assessment criteria and applicable regulatory requirements. These cleanup goals and the cleanup objectives for this treatability study are 5 picocuries per gram (pCi/g) gross alpha, 10 Pci/g gross beta, and 0.9 pCi/g plutonium. In addition to these cleanup goals, the clean soil produced from the treatment process should be a significant percentage of the total amount of soil treated. The treatment objective for percentage of clean soil is 50 percent.

Soil samples will be collected and analyzed prior to treatment in order to characterize the physical properties and the level of radionuclides of the bulk soil sample. Representative samples of soil will be collected during and after initial treatment runs and analyzed by the treatment contractors. Screening data produced from these analyses will be used to adjust the operations of the TRUclean and magnetic separation processes in order to obtain optimum operating conditions. Post-treatment samples of clean soil will be collected following treatment runs at optimal operating conditions to determine if treatment objectives have been met.

The pre- and post-treatment physical property and radionuclide contamination data should be of a known quality, since these data will be used to evaluate the effectiveness of the treatment. According

EG&G Rocky Flats	Manual	21100-WP-OU02 6
Quality Assurance Addendum to the Rocky Flats	Section	QAA-2 6, Rev 0
Site-Wide Quality Assurance Project Plan	Page.	8 of 19
	Effective Date	

to Table 5-1 of the STS Work Plan, analytical level IV data is appropriate for the pre- and posttreatment characterization data that will be used to evaluate treatment alternatives

The data that are used to adjust the process treatment operations is not critical for evaluating the effectiveness of the treatment and are considered screening data. A quick turnaround time is needed for this data, with less ingorous QA/QC. According to Table 5-1 of the STS Work Plan, analytical level II or III data are appropriate for this use

Measurements of precision, accuracy, representativeness, completeness, and comparability (PARCC parameters) are used to indicate data quality. These parameters are defined and the method of calculation is presented in Appendix A of the QAP<sub>I</sub>P. Based on the objectives of the analytical data discussed above, the following objectives for the PARCC parameter measurements are applicable to the data produced during this treatability study.

### 3 2 2 Precision and Accuracy

Precision and accuracy objectives are dependent on the analyte of interest, the sample matrix, analytical method, and the quality control procedures that are applicable to the method of analysis Precision for a given analyte is measured the relative percent difference in concentration of the analyte between the sample and a duplicate sample, or between a spiked sample and a spiked duplicate sample. Precision objectives for analytical level IV data are based on historical precision measures of the method of analysis or  $\pm$  35 percent relative percent difference if historical data are not available Precision objectives for the process operation screening data are not required

Accuracy is measured by the percent recovery of a known spike concentration added to a sample matrix. Accuracy objectives for analytical level IV data are also based on historical objective measures of the method of analysis. Where historical measures of accuracy are not available, the objective is 75 to 125 percent recovery. This is also the accuracy objective for the process screening data.

### 3 2 3 Completeness

Completeness is expressed as the percentage of valid or acceptable data points obtained from measurement or analysis. The target goal for completeness for data packages is 100 percent, with a minimum acceptable of 90 percent.

EG&G Rocky Flats
Quality Assurance Addendum to the Rocky Flats
Site-Wide Quality Assurance Project Plan

Manual Section
Page
Effective Date

21100-WP-OU02 6 QAA-2 6, Rev 0 9 of 19

## 3 2 4 Comparability and Representativeness

Comparability and representativeness are qualitative parameters that are ensured through careful development of and adherence to the sampling and analysis plan, including establishing and following standard sampling and analytical procedures

## 3 3 Field Sampling Program and Sampling Procedures

The bulk soil sample that will be collected for conducting this treatability study will be taken from an area east of the 903 pad (OU-2) where plutonium concentrations are expected to be less than 10 pCi/g. This bulk sample will be collected, composited, split, and containerized as described in the field sampling instruction for sampling plutonium-contaminated soils to support treatability tests at the NTS and LANL, which is presented in Attachment 1 of the STS Work Plan.

Overall treatment optimization of RFP-contaminated soil by the TRUclean process will be achieved over four to six treatment runs. The TRUclean process contractor (AWC-Lockheed) will collect representative samples of all process effluents as described in Section 7 of the STS Work Plan. A sample of clean soil from the final process treatment run will be sent back to EG&G Rocky Flats for post-treatment analyses.

EM Department Operating Procedures that are applicable to collecting plutonium-contaminated soil at OU-2 are listed in Table 1 The TRUclean process treatment procedures are included in the STS Work Plan as Attachment 2

### 3.4 Analytical Procedures

The analytical methods to be used to determine the chemical and physical soil parameters of interest are listed in Attachment A of this QAA Standard analytical procedures that are applicable to the

EG&G Rocky Flats	Manual	21100-WP-OU02 6
Quality Assurance Addendum to the Rocky Flats	Section	QAA-2 6, Rev 0
Site-Wide Quality Assurance Project Plan	Page Effective Date	10 of 19

Table 1 EG&G Operating Procedures That Are Applicable to Collecting Plutonium-Contaminated Soils at OU-2

Former SOP Reference	New EMD OP Reference	
Number	Number	Procedure Trtle
12	FO 02	Field Document Control
13	FO 03	General Equipment Decontamination
16	FO 06	Handling of Personal Protective Equipment
17	FO 07	Handling of Decontamination Water and Washwater
19	FO 09	Handling of Residual Samples
1 10	FO 10	Receiving, Labeling, and Handling Waste Containers
1 11	FO 11	Field Communications
1 12	FO 12	Decontamination Facility Operations
1 13	FO 13	Containerizing, Preserving, Handling, and Shipping of Soil and
		Water Samples
1 15	FO 15	Use of PIDs and FIDs
1 16	FO 16	Field Radiological Measurements
NEW	FO 18	Environmental Sample Radioactivity Content Screening
38	GT 08	Surface Soil Sampling
New	TBD	Field Sampling Instruction for Sampling Plutonium-
		Contaminated Soils to Support Treatability Tests at NTS and
		LANL (See Attachment 1 of the STS Work Plan)

<sup>\*</sup> As required by the Health & Safety Plan

analytical method to be used shall be adhered to by the laboratory(ies) conducting the analysis Analytical laboratories shall prepare sample handling, analysis, and documentation procedures and submit them to the EG&G Rocky Flats Laboratory Analysis Task Leader for review and approval prior to receiving samples for analysis, as required by Section 3 0 of the QAPJP and the EG&G Rocky Flats General Radiochemistry and Routine Analytical Services Protocol

## 3.5 Equipment Decontamination

Non-dedicated sampling equipment shall be decontaminated between samples in accordance with EG&G OP FO 03 (SOP 1 3) Decontamination water will be handled according to EG&G OP FO 07 (SOP 1 7)

## 3 6 Quality Control Checks

Duplicate samples will be collected from each of the bulk characterization samples and from the final treatment process run. Duplicate samples shall be collected in the same manner as the analytical soil sample. The volume of the duplicate samples shall be equal to that of the analytical samples. An equipment rinsate blank shall be collected in the field prior to collecting each bulk composite sample. The procedure for collecting the equipment rinsate blank is described in Section No. 3.0 of the QAPIP.

## 3 6 1 Objectives for the Field QC Samples

Equipment rinsate blanks are considered acceptable (with no need for data qualification) if the concentration of the analytes of interest is less than three times the required detection limit for each analyte as specified in Attachment A. The duplicate sample analysis results should agree within 35 percent of the analytical sample. Trip blanks and field blanks are not applicable to soil samples (see Section No. 3.0 of the QAPJP)

#### 3 6 2 Analytical Laboratory QC

Analytical laboratory QC procedures applicable to the method of analysis shall be used to ensure internal consistency of analytical and storage procedures. Laboratory QC procedures shall include the use of replicate analysis and analysis of duplicate and matrix spike duplicates. All laboratory analysis results, including results of QC sample analysis, will be forwarded to the EG&G Rocky Flats Laboratory Analysis Task Leader.

EG&G Rocky Flats
Quality Assurance Addendum to the Rocky Flats
Site-Wide Quality Assurance Project Plan

Manual Section Page Effective Date 21100-WP-OU02 6 QAA-2.6, Rev 0 12 of 19

### 37 Data Reduction, Validation, and Reporting

Analytical reporting turnaround times are as specified in Table 3-1 of the QAPjP

All analytical data shall be reviewed, evaluated, and verified by the laboratory contractor prior to submitting the data to the Laboratory Analysis Task Leader or data validation subcontractor, as appropriate. The Laboratory Analysis Task Leader or validation contractor will validate the data as described in Section No. 3.0 of the QAPjP. The Laboratory Analysis Task Leader will then forward the validation results along with the entire data package for these samples to the EG&G Rocky Flats. Treatability Study Project Manager and the Data Base Management Task Leader. The Data Base Management Task Leader shall enter the data into the Rocky Flats Environmental Data System. The Project Manager shall prepare a data report for this activity.

## 4.0 PROCUREMENT DOCUMENT CONTROL

The treatability contractors (AWC-Lockheed and LANL) and the laboratory analytical contractors are required to adhere to the applicable requirements of the STS Work Plan, this QAA, and the QAP<sub>j</sub>P These contractors may be required to submit their own QA Program, which would meet the applicable requirements of the QAP<sub>j</sub>P and this QAA

## 5.0 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

The STS Work Plan describes the TRUclean and magnetic separation process, and the soil sampling and characterization activities to be performed. The Work Plan shall be reviewed and approved by the RPD Manager prior to implementing these activities. Any changes to the STS Work Plan after it has been approved shall be reviewed and approved in the same manner as the original Work Plan.

The sampling and treatment operation procedures described in the Work Plan and the general operating procedures listed in Table 1 shall control the field and treatability study activities. The analytical methods referenced in the Work Plan and in Attachment A of this document are the analytical procedures that shall control the analytical process. The applicable data verification and validation procedures listed in Section No. 3.0 of the QAPIP and referenced in Section 3.7 of this QAA shall control the data verification and validation process. Any changes or revisions to these procedures that are necessary to complete the sampling and characterization process shall be documented by preparing a Procedure Change Notice.

EG&G Rocky Flats Quality Assurance Addendum to the Rocky Flats	Manual Section.	21100-WP-OU02 6 QAA-2 6, Rev 0
Site-Wide Quality Assurance Project Plan	Page Effective Date	13 of 19

## 60 DOCUMENT CONTROL

The following documents will be controlled in accordance with Section No 6 of the QAPIP

"Plutonium in Soils Treatability Studies Work Plan, Rocky Flats Plant Operable Unit 2"

"RFP Site-Wide Quality Assurance Project Plan for CERCLA Remedial Investigation/Feasibility Study (RI/FS) and RCRA Facility Investigation/Corrective Measures (RFI/CMS) Studies Activities"

"Quality Assurance Addendum to the Rocky Flats Site-Wide QA Project Plan for CERCLA RI/FS and RCRA RFI/CMS Activities for the Plutonium in Soils Treatability Study"

Operating Procedures (i.e., SOPs) specified in Table 1 of this QAA

## 7.0 CONTROL OF PURCHASED ITEMS AND SERVICES

Contractors that have been selected to perform the treatability study and laboratory analysis of soil samples shall be required to implement all requirements contained in the STS Work Plan, the QAPjP, this QAA, and applicable EG&G OPs listed in Table 1 Contractor performance shall be evaluated through the conduct of inspection, surveillances, and/or audits as described in Section 18 0 of the QAPJP

# 8.0 IDENTIFICATION AND CONTROL OF ITEMS, SAMPLES, AND DATA

### 8 1 Sample Containers

The sample container and volume requirements for the analytical soil samples (i.e., the samples taken from the bulk composite soil sample for chemical and physical characterization and the VOC samples) and the duplicate samples are as follows

Analyte	Volume/Sample	Container	
VOCs	2 X 120 mL	VOA vials	
Semi-Volatiles	8 oz	wide-mouth glass jars	

EG&G Rocky Flats
Quality Assurance Addendum to the Rocky Flats
Site-Wide Quality Assurance Project Plan

Manual	
Section.	
Page	
Effective	Date

21100-WP-OU02 6 QAA-2 6, Rev 0 14 of 19

8 oz

wide-mouth glass jars

Radionuclides

1 liter

wide-mouth glass jars

No preservatives will be used on soil samples. VOC and semi-volatiles (SVOCs) samples will be cooled to approximately 4° C. Holding times are 7 days for VOCs and SVOCs and 6 months for TAL metals. Holding times are not applicable for radionuclides or physical analyses.

Sample containers for shipment of bulk soil samples to NTS and LANL consist of 8-, 30-, and 55-gallon DOT 17H steel drums

## 8 2 Sample Identification

Samples shall be labeled and identified in accordance with Section No 8 0 of the QAPJP. The project identifier will proceed the nine-character alpha numeric identifier described in the QAPJP, in order to identify this as a plutonium in soils treatability study soil sample. This unique identifier shall consist of a "PC" that will proceed the regular nine-character identification number described in the QAPJP. A typical soil sample number would be PC-SS00001XX, where

PC is the treatability study identifier
SS is the sample-type identifier (e.g., SS for soil sample)
0001 is the first sequential soil sample collected
XX is the sampling contract ID

### 8 3 Chain-of-Custody

Sample chain-of-custody will be maintained through the application of OPS-FO 13, Containerizing, Preserving, Handling, and Shipping of Soil and Water Samples (SOP 1 13)

## 9.0 CONTROL OF PROCESSES

The TRUclean and magnetic separation processes are described in Sections 6 and 7 of the STS Work Plan

## 100 INSPECTIONS

EG&G Rocky Flats	
<b>Quality Assurance Addendum to the Rocky Fla</b>	rts
Site-Wide Quality Assurance Project Plan	

Manual Section Page Effective Date 21100-WP-OU02 6 QAA-2 6, Rev 0 15 of 19

Inspections are not applicable to this activity (Note field and laboratory observations are not considered inspections, but are rather considered surveillances or audits)

## 11.0 TEST CONTROLS

The standard operating procedures for controlling the TRUclean process and magnetic separation process for this treatability study are included as Attachments 2 and 3 of the STS Work Plan

# 12.0 CONTROL OF MEASURING AND TEST EQUIPMENT (M&TE)

Field M&TE is not anticipated for use in this activity. The laboratory equipment used to analyze environmental samples shall be calibrated, maintained, and controlled in accordance with the requirements contained in the specific analytical methods used and the instrument manufacturer's instructions.

# 13.0 HANDLING, STORAGE, AND SHIPPING

Samples shall be packaged, transported, and stored in accordance with the requirements specified in Section 8. The soil samples shall be screened for radiation contamination in accordance with OPS-FO 18, Environmental Sample Radioactivity Content Screening (SOP 1 18). The radiation screening process is illustrated in Figure 8.2 of Section No. 8.0 of the QAPJP. The laboratory that will perform the physical analyses will accept samples only if radiation levels are less than 100 millicurie per sample.

# 14 0 STATUS OF INSPECTION, TEST, AND OPERATIONS

The treatability contractors shall maintain and report the status of the process operations to the EG&G Rocky Flats Treatability Study Project Manager

## 15 0 CONTROL OF NONCONFORMANCES

The requirements for the identification, control, evaluation, and disposition of nonconforming items, samples, and data will be implemented as specified in Section No. 15.0 of the QAP<sub>J</sub>P Nonconformances identified by the treatment and analytical contractors shall be submitted to the EM Department Quality Assurance Project Manager (QAPM) for processing as outlined in the QAP<sub>J</sub>P

EG&G Rocky Flats			
<b>Quality Assurance A</b>	ddendum to the	Rocky	<b>Flats</b>
Site-Wide Quality Ass	surance Project	Plan	

Manual Section Page Effective Date 21100-WP-OU02 6 QAA-2 6, Rev 0 16 of 19

### 16.0 CORRECTIVE ACTION

The requirements for the identification, documentation, and verification of corrective actions for conditions adverse to quality will be implemented as outlined in Section No. 16.0 of the QAPJP Conditions adverse to quality that are identified by contractors shall be documented and submitted to the EM Department QAPM for processing as outlined in the QAPJP

## 17 0 QUALITY ASSURANCE RECORDS

Field sampling data records will be controlled in accordance with OPS-FO 02 (SOP 1 2), Field Document Control, and shall be considered QA records. Laboratory chemical and physical analytical data packages shall also be considered QA records. Other records associated with this activity that will be considered QA records include, but are not necessarily limited to, the following

Chain-of-custody records STS Work Plan QAP<sub>I</sub>P/QAA

- Raw data results

  Audit/Surveillance reports

  Nonconformance reports

  Corrective Action reports
- Data validation results
   Procurement/contracting documentation

All QA records generated during the planning and implementation of this activity will be submitted to the EM Department Custodian (who reports to the Environmental Resource and Information Management Division Manager) for processing according to the EM Department QA records system described in Section No. 17 0 of the QAPJP

## **18.0 QUALITY VERIFICATION**

The requirements for the verification of quality shall be implemented as specified in Section No. 18 0 of the QAPjP. The EM Department QAPM shall develop a surveillance/audit schedule as deemed appropriate for this treatability study. The surveillance will be scheduled to observe the TRUclean process and the gravimetric separation process. A surveillance of the laboratory analysis will be

EG&G Rocky Flats Quality Assurance Addendum to the Rocky Flats Site-Wide Quality Assurance Project Plan	Manual. Section Page Effective Date	21100-WP-OU02 6 QAA-2 6, Rev 0 17 of 19
Site-Wide Quality Assurance Project Plan	Page Effective Date.	17 of 19

conducted at the discretion of the EG&G Laboratory Analysis Task Leader and the EG&G Project Manager for this activity A surveillance of the records produced from this activity will also be conducted

# 19.0 SOFTWARE VERIFICATION

The use of computer software during the conduct of this activity is not anticipated. Therefore, the requirements of Section No. 19 0 of the QAPJP are not applicable to this activity.

EG&G Rocky Flats
Quality Assurance Addendum to the Rocky Flats
Site-Wide Quality Assurance Project Plan

Manual Section Page Effective Date 21100-WP-OU02 6 QAA-2 6, Rev 0 18 of 19

## Attachment A

Analytical Methods, Detection Limits and Data Quality Objectives

## ANALYTICAL METHODS, DETECTION LIMITS, AND DATA QUALITY OBJECTIVES

Analyte	Method	Detection Limit	Precision Objective	Accuracy Objective
AL Metals	EPA 6010ª	1	**	***
CL VOCs	EPA 8240ª	1	**	***
CL SVOCs	EPA 8250ª	1	**	***
dionuclides	2	1	**	***
sical Analysis				
article Size	ASTM D-422	N/A	N/A	N/A
Specific Surface Bulk Density	Agronomy #9 TDL 2110	N/A N/A	N/A N/A	N/A N/A

<sup>\*\*</sup> Precision objective based on relative percent difference (see QAP)P Appendix A for equation) between sample and spiked duplicate Precision objective based on referenced method

Accuracy objective is based on the percent recovery of spiked duplicate (see Appendix A of the QAPIP) Accuracy objective based on referenced method

<sup>&</sup>quot;Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods" (SW-846, 3rd ED), U.S. Environmental Protection Agency

Detection limit will be based on practical quantitation limit, which is dependent on the specified method of analysis

The method of analysis has not yet been specified, but one of the methods listed in Appendix B of the QAP<sub>I</sub>P will be used

